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January 11, 2013

Nicole Delarocca
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

American Crossroads is in receipt of your correspondence dated November 16, 2012, and November 21, 2012, regarding the Committee's September and October monthly filings, respectively. The issues raised are addressed below.

Re: September 2012 monthly report

1. After reviewing the September 2012 monthly report, we discovered that the Line 21(b), 21(c), and 29 figures did not calculate correctly on the Detailed Summary Pages. The underlying data, however, was all correct. We regenerated the report and the errors are resolved. An amended report has been filed which addresses the discrepancies noted in your RFAI.

2. On August 20, 2012, American Crossroads filed a 48 hour notice of independent expenditure disclosing a payment to Targeted Victory for web ads in support of Mitt Romney. On the September 2012 monthly report, Schedule E, this same payment was reported as opposing Barack Obama. The former description was correct, and the September 2012 monthly report has been amended to indicate that the expense was in support of Mitt Romney. To reiterate, there was only one payment made to Targeted Victory on August 20, 2012, and the amendment filed corrects the error/discrepancy noted in your correspondence.

Re: October 2012 monthly report

1. Your correspondence highlights a transaction with Bluefront Strategies LLC on September 5, 2012, in the amount of \$80,000, that was reported September 19, 2012. This transaction involved additional funds spent to distribute the same communication as was first disclosed on September 6, 2012, via 48 hour report. (Specifically, the same web advertisement was distributed by both Targeted Communications and Bluefront Strategies.) American Crossroads subsequently received an invoice from Bluefront Strategies, which was paid on September 19, 2012. At that time, American Crossroads filed an amended September 6, 2012, 48 hour report to disclose the additional funds spent on the same, previously reported advertisement.

Sincerely,

Caleb Crosby
Treasurer
